

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

3M Company
11900 E Eight Mile Road
Detroit, Michigan 48205

ATTENTION:

Stephen Florek
EHS Engineer

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency (EPA) is requiring 3M Company (3M or you) to submit certain information about the facility at 11900 E Eight Mile Road, Detroit, Michigan 48205. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to EPA within 30 calendar days after you receive this request.

EPA is issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

3M owns and operates an emission source at the Detroit, Michigan facility. EPA is requesting this information to determine whether your emission source is complying with the Michigan State Implementation Plan.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

You must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to EPA. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

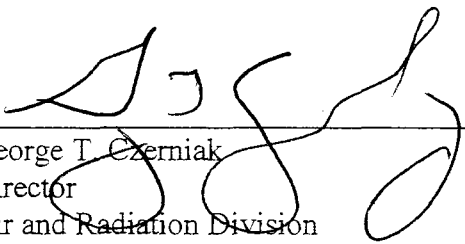
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

EPA may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject 3M to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Marie St. Peter at (312) 886-4746 or at stpeter.marie@epa.gov.

5/5/14
Date


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term “the facility” shall refer to 3M Company Detroit Abrasives Division’s facility located at 11900 E Eight Mile Road in Detroit, Michigan. This term includes all operations and related equipment.

4. The term “production run” shall be defined as one specific product family which may have many product grades within the production run.
5. The term “abrasive material” shall refer to any single finished product produced at the facility.

Appendix B

Information You Are Required to Submit to EPA

3M Company (3M) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), for its Detroit Abrasives Division's facility (the facility) located at 11900 E Eight Mile Road in Detroit, Michigan, within 30 calendar days of its receipt of this letter.

1. Provide the dimensions of the combustion chamber of the facility's thermal oxidizer.
2. Provide a copy of the operating manual(s) for the facility's thermal oxidizer and its monitoring system.
3. Provide a list of all emissions tests conducted at the facility for any reason, whether or not completed, since installation of the facility's thermal oxidizer, and provide copies of all emissions test reports. Emissions testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. If test reports are not available, provide data generated during the test. Use the following guidelines for compiling the list and preparing copies of the stack test reports:
 - a. **List:** Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with the Michigan Department of Environmental Quality.
 - b. **Copies:** Provide full stack reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
4. Provide all documents related to all studies, inspections, or evaluations associated with air pollution control equipment and systems that have been conducted or attempted at the facility from January 2011 to the present, including but not limited to:
 - a. System improvements implemented based on the findings of any study, inspection, or evaluation;
 - b. Modeling emissions of air pollutants to the atmosphere; and,

- c. Capture and collection of pollutants emitted by the facility.
5. From the period of January 2011 to the present, provide records showing the calibration, maintenance and repair for the continuous monitoring system(s) at the thermal oxidizer.
 6. For the period of January 2011 to the present, provide all records of repair, maintenance and modification on the thermal oxidizer. For all repairs, identify whether the repairs were temporary or permanent and when the repair was finished. For all modifications, provide a statement that explains the reason the modification occurred. For all parts and components of the thermal oxidizer currently in need of repair or maintenance, identify the part or component, the date it was determined to be in need of repair or maintenance, and the schedule for completion of the repair or maintenance.
 7. Provide a spreadsheet, in Microsoft Excel or compatible format, of the following hourly averaged continuous records, from January 2011 to the present, for the facility's thermal oxidizer during periods of production:
 - a. Temperature (Fahrenheit);
 - b. Flow rate (cfm);
 - c. Fan frequency (hertz);
 - d. Fan power (KW);
 - e. Static pressure at the outlet (inches of water); and,
 - f. Static pressure at the inlet (inches of water).
 8. Provide copies of all annual emissions reports submitted to Michigan DEQ for the facility from 2011 to the present, and include:
 - a. A narrative describing the method used, from January 2011 to the present, for emissions calculations for each pollutant from all emission units, including the basis of any emissions factors used; and
 - b. Include any documents outlining the procedures for calculating annual emissions, including all assumptions on capture efficiency of air pollution control devices at emission sources.
 9. Provide a spreadsheet, in Microsoft Excel or compatible format, of the following for EU-ABRASIVEPAPER on a calendar month basis from January 2011 to the present:
 - a. Date and time of each startup and shutdown of the thermal oxidizer;
 - b. Date, time, and duration of each time the thermal oxidizer was bypassed during a production run;
 - c. Date and time of start and stop for each production run;

- d. Gallons (with water) of each coating and solvent used separately, during periods of thermal oxidizer operation on a production run basis;
 - e. Gallons (with water) of each coating and solvent used separately, during periods of thermal oxidizer bypass on a production run basis;
 - f. VOC content in lbs/gallon (minus water and with water) of each coating and solvent, as applied, on a production run basis;
 - g. VOC mass emission calculations determining the monthly emission rate in tons per calendar month as determined at the end of each calendar month;
 - h. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month;
 - i. Gallons (with water) of each formaldehyde-containing material used;
 - j. Formaldehyde content in weight percent as applied on a production run basis;
 - k. Formaldehyde mass emission calculations determining the monthly emission rate in tons per calendar month; and
 - l. Formaldehyde mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
10. Provide records, from January 2011 to the present, of operating hours when EU-ROLLCURE bypassed the facility's thermal oxidizer. The records should indicate the date and duration of every bypass event.
 11. Provide a list of all air enforcement actions related to the facility taken by any state or local regulatory agency, or air-related citizen complaints, from January 1, 2004 to the present. Include copies of any air-related administrative or judicial complaints; any notices of violation or notices of non-compliance; any documents resolving any alleged violations, such as consent decrees or consent orders; and any orders, such as administrative orders.
 12. To the extent not provided by the paragraphs above, provide copies of any correspondence, from January 2011 through the present, between the state, local, or federal permitting authority regarding the installation or modification of any emissions unit or the emission limits for any emissions unit at the facility, including, but not limited to, applicability determinations, regulatory interpretations, and approval orders.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

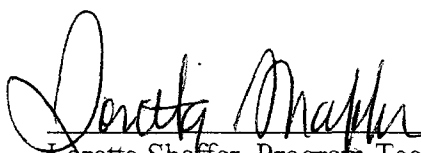
Stephen Florek
3M Corporation
11900 E Eight Mile Road
Detroit, Michigan 48205

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by e-mail:

Tom Hess
Enforcement Unit Manager, Air Quality Division
Michigan Department of Environmental Quality
HESST@michigan.gov

Mina McLemore
Detroit District Supervisor, Air Quality Division
Michigan Department of Environmental Quality
mclomorew@michigan.gov

On the 6 day of May 2016.



Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7673 8408